

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
KELLY SCHOMBURG,

Plaintiff,

-against-

New York City Police Department DEPUTY
INSPECTOR ANTHONY BOLOGNA, OFFICER
ARETHA BLISSETT-SMITH, CITY OF NEW
YORK, and OFFICER JOHN DOE 1 through
OFFICER JOHN DOE 10,

Defendants.

12 Civ. 7161(RWS)(DCF)

ECF Case

DECLARATION OF DEBRA L. GREENBERGER

DEBRA L. GREENBERGER, an attorney duly admitted to practice in the
Southern District of New York, declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate at the law firm of Emery Celli Brinckerhoff & Abady
LLP, attorneys for Plaintiff Kelly Schomburg in the above-captioned matter. I submit this
declaration in support of Plaintiff's motion to compel the New York County District Attorney's
Office ("DANY") to produce the closed investigation file concerning Defendant Bologna's
conduct on September 24, 2011, and for such other relief as the Court deems appropriate and
just.

2. Appended as exhibits hereto are true and correct copies of the following
documents:

Plaintiff's subpoena to DANY, dated September 3, 2013 A
DANY's letter, dated September 13, 2013, objecting to Plaintiff's subpoena B
Defendant City of New York's subpoena to DANY C

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 19, 2013
New York, New York

/s/
DEBRA L. GREENBERGER